

February 6, 2003



Joe Werner
Chief, Telecommunications Division
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

RECEIVED
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TENNESSEE REGULATORY AUTHORITY
DOCKET ROOM

VIA OVERNIGHT COURIER

Re: Docket 02-00207/ Petition of the Tennessee UNE-P Coalition to Open A Contested Case
Proceeding to Declare Unbundled Switching An Unbundled Network Element

Dear Joe:

I apologize for failing to timely reply to your October 25, 2002 letter. Momentum Business Solutions ("Momentum") mistakenly believed the letter only required a response from Switched Based CLECs. Since Momentum is very small, and not currently switched based, we did not respond.

We strongly support the Petition of the UNE-P Coalition to declare unbundled switching an unrestricted network element. Without switching, it would be impossible to provide services to many of Tennessee's consumers, for example rural consumers, who would receive none of the benefits that other areas are currently enjoying.

Please accept the following as our responses to you inquiry:

1. None at this time.
2. None at this time.
3. Yes, although the numbers vary from day to day, our numbers are provided below.
 - (a) 2,831
 - (b)(i) 317
 - (b)(ii) 332
 - (b)(iii) 3221
 - (c)(i) 3,553
 - (c)(ii) 0
 - (c)(iii) 0
 - (c)(iv) 0
 - (d)(i) 317
 - (d)(ii) 0
 - (d)(iii) 0

(d)(iv) 0

4. Yes, although the numbers vary from day to day, our numbers are provided below.

(a) 2,804

(b)(i) 67

(b)(ii) 73

(b)(iii) 2731

(c)(i) 2,804

(c)(ii) 0

(c)(iii) 0

(c)(iv) 0

5. No. We are unaware of a competitive market for switching in Tennessee.

6. (a) We believe we are well informed as to the current market conditions, and while we have not conducted any "investigation" as to other carriers selling switching, we have never heard of a market for switching in Tennessee.

(b) No. We have never requested switching from any carrier other than BellSouth because we know of no market for such services.

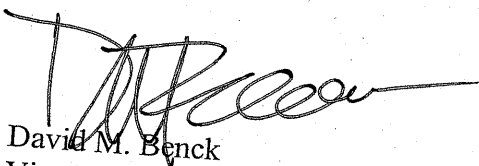
7. None.

8. None as we do not currently own any switching facilities.

9. None as we do not currently own any switching facilities.

If I can be of additional assistance, do not ever hesitate to contact me. Momentum greatly appreciates the commitment the TRA has shown to competition and consumer protection.

Sincerely,



David M. Benck
Vice President, Legal and Regulatory

Cc: Henry Walker
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